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November 29, 2018

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
Via ECF

Re: *United States v. Ethan Cave*
18 Cr. 689 (AT)

Dear Judge Torres:

This letter is respectfully submitted in compliance with Your Honor's order directing defense counsel to advise the Court whether it intends to file motions and to propose a briefing schedule. I have conferred with Assistant U.S. Attorney Adam Hobson and codefendant Fernandez' attorney, David Bertan. The parties jointly propose that defense motions be filed by January 21, 2019, prosecution response February 18, 2019, and the defense reply, if any, by February 25, 2019.

Defendant Cave intends to file, at the least, a motion to suppress tangible property. The government advises that it is still attempting to procure information from the State concerning the identification of the accused. I am picking up the defendant's recorded statement tomorrow and, if motions are necessary with respect to identification and statements, will file them in accord with the schedule set by the court. Mr. Bertan is evaluating his suppression and other options. It is his current intent to file motions relating to a search warrant and defendant statements. If Mr. Bertan decides not to file motions, he will advise Your Honor by letter. Thank you for your consideration. We remain

Respectfully,
GR Goltzer
George R. Goltzer

cc: All parties via ECF